



October 28, 2005

Nevada Division of Environmental Protection
Bureau of Corrective Actions, Remediation and LUST Branch
1771 East Flamingo Road, Suite 121-A
Las Vegas, Nevada 89119-0837

for:

Randall L. Jackson, Health, Safety & Environmental Director
DCI Management Group, Ltd.
4510 W. 63rd
Terrace Prairie Village, KS 66208

Re: **Corrective Action Plan**
Former Al Phillips The Cleaners, Inc.
Maryland Square Shopping Center
3661 South Maryland Parkway, Las Vegas, Nevada
Facility ID: H-000086

Attn: Ms. Shannon Harbour, EI

This Corrective Action Plan (CAP) letter is in response to your September 6, 2005, letter to Mr. Randall Jackson, regarding submittal of a CAP by October 24, 2005, for the above referenced facility. Based on our telephone conversation on October 21, 2005 you approved getting this information to you by today. Al Phillips the Cleaner (Al Philips) understands the Nevada Division of Environmental Protection's (NDEP) desire and urgency in moving forward with corrective action at the former Al Phillips facility and concurs that developing and implementing some form of remedial action is necessary. However, data and technical roadblocks stand in the way of preparing and submitting a CAP that will prove effective in remediating PCE at the site and within the groundwater plume. The following paragraphs outline these roadblocks.

With regard to the former Al Phillips facility, this site had been for sale and no information regarding the new owner of the site or development plans was available due to a stall in sale negotiations. The Clark County School District (CCSD) had been trying for months to finalize sale of the Maryland Square Shopping Center property. One month ago the Clark County Assessor's Office (Assessor) identified CCSD as the owner. Based on the Assessor's current web site information, the property was recently sold to Maryland Square LLC (MS LLC) of Needham, MA. Al Phillips is currently trying to obtain personnel contact information for MS LLC from the CCSD to ascertain what the future development plans for the site might include. This issue is critical for making a decision regarding remedial action for PCE impacted soil beneath the former Al Philips facility. Remedial options for this soil, i.e. excavation or soil vapor extraction, will take on different characters based on what MS LLC plans for the site. It is in the interest of everyone that a favorable alternative be selected in an effort to minimize impact to development activities and the selected future use of the property. Respectfully therefore, Al Phillips will forge ahead in communicating with MS LLC seeking a determination as to the future development plans for the site and in developing a CAP for this portion of the facility. Al Philips hopes to provide NDEP information regarding this issue within the next few months.

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URS Corporation
7180 Pollock Drive, Suite 200
Las Vegas, NV 89119
P: (702) 837-1500
F: (702) 837-1600

Regarding remedial action within the PCE groundwater plume, several groundwater remediation methods, including air sparging (AS), ozone injection, and hydrogen release compound have been performed for several years by a number of companies, including Al Phillips, in the Las Vegas area with limited or no real success. Based on the results of AS and ozone injection at several Al Phillips sites in the valley, it is apparent that difficult groundwater and soil chemistry conditions, including elevated total dissolved solids, low total organic carbon content, and background oxygen concentrations around 3 to 6% make anaerobic degradation of PCE difficult. Within the last several months NDEP has approved a pilot test using injection of permanganate solution into a PCE groundwater plume located at Nellis Air Force Base. To our knowledge, successful determination of the short-term outcome and long-term effectiveness of this remedial method has not been made. Al Phillips wants to utilize a remedial method that demonstrates effective PCE degradation so that progress at remediating the PCE groundwater plume at the site can be demonstrated. Al Phillips is in the process of establishing a remedial system at one of its Las Vegas sites that will utilize mechanical stripping of PCE from groundwater. This is a pilot test site that has not begun operation yet and success may not be determined until sometime next year. Therefore, Al Phillips respectfully requests that NDEP allow more time to evaluate the results of these two pilot tests and methods and results from other projects before selecting a remedial method.

Al Phillips requests that NDEP allow 180 days to gather the data and results needed to properly prepare a CAP for this site. We are prepared to update you on status of these pending issues on a monthly basis to keep you abreast of pertinent changes and findings. Al Phillips is committed to remediation of soil and groundwater impact to control risk to human health and the environment at this site. If you have questions regarding this information, please contact Mr. Scott Ball from URS at 837-1500.

Sincerely,
URS Corporation



Scott Ball, C.E.M. 1316, Expiration: 10/15/07
Senior Project Manager

Cc: Mr. Randall L. Jackson, DCI
Mr. Michael Stebbins, Tomlinson Zisko, LLC.